Before the
Federal Communications Commission
Washington, D.C. 20554

In the Matter of	)	
	)	
Carrier Current Systems, Including Broadband over Power Line Systems	)	ET Docket No. 03-104
	)	
	)	
Amendment of Part 15 Regarding New Requirements and Measurement Guidelines for Access Broadband over Power Line Systems	)	ET Docket No. 04-37

REPLY COMMENTS OF COMSEARCH

Comsearch hereby respectfully submits the following reply comments in the above captioned proceeding. Comsearch is a division of Andrew Corporation. Over 67 years old, Andrew Corporation employs more than 7,000 employees and is an S&P 500 company traded on the NASDAQ National Market System under the symbol ANDW. Comsearch, headquartered in Ashburn, Virginia is an independent engineering firm specializing in spectrum management of terrestrial microwave, satellite and mobile telecommunications systems. Comsearch interacts with the Federal Communications Commission (Commission) and the National Telecommunications and Information Administration (NTIA) and actively participates in various industry groups such as the National Spectrum Managers Association (NSMA), the Telecommunications Industry Association (TIA), and the Institute of Electrical and Electronics Engineers (IEEE) to develop rules, industry recommendations, and standards to promote the efficient use of the radio spectrum. Since 1977, Comsearch has been a leading provider of engineering services and software for mobile, microwave and satellite communications systems,

both domestically and internationally. In this role, we have gained extensive experience in developing industry-standard coordination processes, developing and maintaining state-of-the-art software and databases, performing interference analyses of complex environments, and understanding regulatory requirements.

In the NPRM the Commission proposes a requirement to notify an industry-operated entity of the parameters of BPL operation so that a database may be developed for interference management purposes. This database would be publicly accessible under the Commission's proposal. While most comments support the creation of such a database, several parties express concern about the privacy of the data. The primary fear is that making the data publicly available could affect the security of the national electric power grid. In addition, releasing competitive information on the location of broadband deployments could be harmful to the business of BPL operators.

To address such privacy concerns, Current Technologies and Cinergy Corp. both propose that the database be maintained and operated by a trusted third party. Under these proposals the trusted third party would be responsible both for creating and maintaining the database of BPL deployments and also for responding to interference complaints from licensees. The database information would not be released in bulk. Instead, interference analysis results would be reported and in cases where a potential for harmful interference was identified, the BPL operator would work with the affected licensee to verify and mitigate the interference.

Based on our experience with spectrum management databases and web-based analysis software, we believe it is feasible for a third party administrator to perform the database and interference analysis functions outlined generally in the Current Technologies and Cinergy Corp. proposals. We agree with Current Technologies that the database administrator should be a "trusted, technically qualified third party having the confidence of both the Access BPL industry and the communities of licensed spectrum users, with experience in operating comparable databases."[1] In order to operate with the confidence of parties on both sides of the interference issues, we believe that the database administrator would have to implement analysis procedures and criteria that are determined by industry groups with the input of both Access BPL providers and affected licensees. Furthermore we agree that to avoid even the appearance of a conflict of interest, the administrator should be independent of both the electric power industry and the community of licensees. If properly established, an independent third party entity could effectively manage the registration database and respond to interference concerns of licensees.

Respectfully Submitted,
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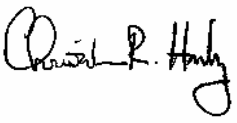

Prepared by:_____
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Date: June 1, 2004

[1] Comments of Current Technologies, LLC at 22.